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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

RODEO CREEK GOLD INC.,

- ☐ Affects this Debtor
☒ Affects all Debtors
☐ Affects Antler Peak Gold Inc.
☐ Affects Hollister Venture Corp.
☐ Affects Touchstone Resources Company

Debtors.

Case No. 13-50301-mkn
 (LEAD CASE)
 Chapter 11

Joint Administration with
 Case No. 13-50302-mkn
 Case No. 13-50303-mkn
 Case No. 13-50304-mkn

**NOTICE OF RESERVATION OF RIGHTS
 TO DEBTOR'S MOTION CONCERNING
 THE PROPOSED SALE OF DEBTORS'
 ASSETS, BIDDING PROCEDURES, AND
 OTHER RELATED ISSUES**

Caterpillar Financial Services Corporation ("Caterpillar"), by and through its undersigned counsel, hereby files its Notice of Reservation of Rights to the Motion for: (I) An Order (A) Scheduling a Hearing to Consider the Proposed Sale of the Debtors' Assets and Approving the Form and Manner of Notice Thereof, (B) Establishing Bidding Procedures Relating to the Sale and the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts, and (C) Granting Certain Related Relief; and (II) An Order (A) Approving the Sale, (B) Authorizing the Sale, Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Certain Related Relief [Docket No. 16] (the "Motion") filed by Rodeo Creek Gold Inc. ("Rodeo") and its affiliated

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1 debtors and debtors-in-possession (each a "Debtor" and collectively, the "Debtors") in the above-
2 captioned Chapter 11 cases (the "Chapter 11 Cases").

3 On April 23, 2013 and April 24, 2013, an auction was conducted to sell the Debtors'
4 assets (the "Sale"). As of this time, the Asset Purchase Agreement and final form of order
5 approving the Sale have not been filed by the Debtors and thus are not able to be reviewed by
6 Caterpillar. Therefore, Caterpillar reserves its right to object to the Asset Purchase Agreement
7 and/or the order approving the Sale.

8 DATED this 26th day of April 2013.

9 SNELL & WILMER L.L.P.

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11 By: /s/ Charles E. Gianelloni
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